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Federal Communications Commission
Office of the Secretary

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)
)
Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements of Part 73 of the)
Commission's Rules)

MM Docket No. 87-268

COMMENTS

BellSouth Corporation respectfully submits its comments
in the above-captioned Docket.

I. INTRODUCTION

On September 1, 1988, the Commission released its
Tentative Decision ("TD") and Further Notice of Inquiry
("FNOI") in this proceeding. In its Tentative Decision, the
Commission concludes that the terrestrial broadcast use of
advanced television ("ATV") is in the public interest and
that the benefits of this technology can be realized by the
public most rapidly if existing broadcasters are permitted
to implement ATV. The Commission also concludes that any

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spectrum capacity needed for broadcast ATV systems will be obtained from the spectrum currently allocated to broadcast television. Moreover, existing service to viewers utilizing NTSC receivers must be continued irrespective of the actual method by which ATV services are delivered. Finally, the Commission concludes that it is in the public interest not to retard the development of ATV in other services or on non-broadcast media.

BellSouth applauds the Commission's findings which promote the development of ATV while preserving the public interest by requiring the continued provision of terrestrial broadcast service to viewers with NTSC receivers. Such an approach will prevent the early obsolescence of millions of TV receivers.

BellSouth further applauds the Commission's restraint in not requiring a single ATV standard for all media at this time. BellSouth believes that the public interest will best be served by proceeding cautiously when considering ATV standards for non-broadcast media.

II. THE COMMISSION SHOULD MAINTAIN FLEXIBILITY IN THE DEVELOPMENT OF STANDARDS FOR ATV

The Commission seeks comments as to the desirability of establishing a single standard for the development of ATV or establishing more than one standard and tentatively concludes that flexibility is needed in the standard setting process. The Commission appropriately notes that "detailed, inflexible standards that have the force of law may reduce

consumer choice and prevent the timely introduction of new technology."¹ The Commission aptly concurs with Working Party 5 of the Advisory Committee's Planning Subcommittee that "[if] there is a general prescription for agency involvement, it would be to preserve flexibility in the standard setting process to the greatest extent possible."² BellSouth supports the preservation of flexibility in the standards-setting process.

BellSouth further supports the Commission's tentative conclusion that although the Commission intends to have a role in the ATV standards-setting process, input from the industry, with its technical expertise, is crucial in the development of appropriate standards. The Commission appropriately notes that industry "efforts will contribute materially to the information necessary to make an appropriate decision in this matter."³

III. DEVELOPMENT OF APPROPRIATE RECEIVER INTERFACES SHOULD ALLAY ANY CONCERNS OVER FLEXIBILITY AND COMPATIBILITY

The Commission concludes that it does "not intend to retard the introduction of ATV on non-broadcast media," nor does it "intend at this point to require compatibility among the various media or set specific signal or equipment

¹ FNOI, para. 115.

² Advisory Committee, Planning Subcommittee Working Party 5, Report at 97 (May, 1988); FNOI, at para. 115.

³ FNOI, at para. 121.

standards for this purpose."⁴ BellSouth supports this tentative conclusion and urges the Commission to encourage interested parties to develop methods for designing a required standard broadband interface of simple and straight-forward design that would be usable by the consumer in selecting among several possible delivery systems. This interface should allow access to the display, and should also make the processing resources of the ATV available at an external interface. Such an interface could additionally permit software definition and control, particularly from remote control devices, by the consumer in his interaction with the ATV system.

One approach to compatibility that has been suggested is an "open architecture" receiver. The Commission seeks comments as to the specific advantages and disadvantages of an Open Architecture Receiver approach and states that "[i]f there are alternative ATV systems and no individual system is clearly superior, would an Open Architecture Receiver approach be preferable to standards-setting?"⁵ Such an approach would appear to afford a panoply of options for delivery of ATV signals, including the interface described previously. This approach should be encouraged, as well as other possible approaches which include such an interface, with proper emphasis being placed on a cost-effective means

⁴ FNOI, at 133.

⁵ FNOI, at para. 122.

for implementing a functional system.

IV BELLSOUTH SUPPORTS THE COMMISSION'S TENTATIVE DECISION
RELATING TO ALLOCATION OF SPECTRUM

The Commission's tentative conclusion to allow broadcasters to provide ATV over an additional full 6 MHz channel within the allocated broadcast spectrum while continuing to offer NTSC video over the presently allocated broadcast channel is an appropriate choice, given the current limitations of the spectrum. Such a conclusion will permit the maximum possible bandwidth signal for broadcast devoted to ATV, while at the same time allowing non-broadcast media to develop to their maximum potential.

V. CONCLUSION


The Commission's TD and FNOI represent a thorough and reasoned analysis of a burgeoning technology and how best to develop it. Moreover, the Commission's decision to allow flexibility in the development of standards and its tentative conclusion not to retard the development of ATV on non-broadcast media best represent the interest of the consumer who stands most to benefit from having a choice of

alternatives for the delivery of ATV.

Respectfully submitted,

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